

Message

From: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Sent: 6/9/2017 9:32:06 PM
To: Keller, Lynn [Keller.Lynn@epa.gov]
Subject: RE: Process for Landfill/CAMU on source area

Thanks Lynn! Lots of good information here. Are you suggesting the tasks would be:

Identification of location – ideally a location where capping would be the best remedy
Creation of OU
Investigation of source area to determine if there is anything required other than capping (so you don't prohibit future remediation)
Construct CAMU

We wouldn't need to go through PP, ROD, AO process in order to build CAMU? What documentation would you need for "predecisional" landfill?

The County cannot change the zoning. I believe the WRND was zoned as light industrial back in the 1970s when the County first developed zoning areas. I don't believe there has ever been a change to the WRND zoning. It just got assigned that zoning at the beginning (which was after the dump was unofficially "closed". The only way zoning is changed now is when there is an application to change it.

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From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Friday, June 09, 2017 1:38 PM
To: Fennessy, Christopher
Subject: [EXTERNAL] RE: Process for Landfill/CAMU on source area

Chris,

It's been a while since we discussed this CAMU idea internally, but Larry Bradfish had looked a few things up and thought he found some sort of ARAR issue that popped up. He's going to find it and look a little closer at the McClellan AFB Superfund site (where they also have a CAMU) to see how it relates to AR. I'm not how much Federal Facilities Agreements differ from private sites like AR, but the McClellan AFB ROD is a potential reference for how to implement a consolidated haz waste facility.

Larry agrees with me (and you) that we don't see how CEQA and the Water Board pursuing a permit would apply; we can talk more about that later with Alex, but EPA likely would not require that.

One question Larry had that I think you should look into ASAP is, what if the County changes the zoning requirements on the Aerojet facility such that zoning no longer permitted a Class II landfill on site? How much influence do counties and

municipalities have on how AR selects future site use? I didn't think the County had jurisdiction on AR property to restrict your ability to construct a landfill, but it's good to find out the definitive answer now before this goes any further. The county might object to landfill construction given their sudden zoning change at White Rock Dump?

Larry also agrees with me that the best approach for a new CAMU is to put it in an already contaminated area that has not yet been assessed—probably OU7 or OU9—and make a new OU out of it (OU12!). If we construct a CAMU in an area prior to a ROD it's predecisional since remedial alternatives haven't been evaluated yet. If we construct a CAMU in an area with an existing ROD, ROD amendments would be required. It makes the most sense to focus any future CAMU construction on areas unlikely to be redeveloped, already contaminated, centrally located in an area AR would likely retain, and as far as possible from any redevelopment areas. It seems like OU8 may be redeveloped at some point, so might be best to look at potential locations in OU7 and OU9. I'm unsure of the justification process for this but can find out more. I'm sure some investigation/feasibility study would be needed to justify the selected site's appropriateness for use as a Class II landfill, and ensure placement there won't exacerbate contamination or prohibit achievable remediation in the area or surroundings.

As of now, Larry and I don't see any reason why non-CERCLA waste cells couldn't also be constructed in an on-site CAMU, but we need to look more into the regs to be sure. Some land in OU7 and OU9 will have extremely limited future use potential, so landfill use might be reasonable, and might help AR finance some of the cleanup. What is WRND waste material?

I'm looking for CAMU examples, and McClellan popped up again. McClellan AFB used a consolidated waste facility as a part of cleanup, and discussed it in the Focused Strategic Sites and Follow on Strategic Sites RODs (links to RODs are on web site below). From the former McClellan RPM:

There is an attachment to the Focused Strategic Sites ROD which is the technical white paper describing the modeling approach used. Also, the text of the ROD goes into some detail about the Consolidation Unit and the information supporting its use in the remedy selection.

[https://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/McClellan+Air+Force+Base+\(Groundwater+Contamination\)?OpenDocument](https://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/vwsoalphabetic/McClellan+Air+Force+Base+(Groundwater+Contamination)?OpenDocument)

[8] Focused Strategic Sites ROD (signed April 2012; AR# 7522): This ROD addresses contamination associated with the Air Force's former waste disposal pits and large volume sites that are the most technically challenging. The Air Force prepared an FS and selected a preferred alternative in the PP. The Air Force selected remedies to cap waste disposal pits CS 011, CS 012, CS 013, CS 014, AOC 313, PRL 008, and the Vadose Zone Site; excavate, ex-situ treat, and consolidate waste from CS 010, CS 024, and the Small Arms Firing Range site; partially excavate, ex-situ treat, consolidate and cap waste from the CS 022 site; and use the open excavation at one of the excavated disposal pits (CS 010) to contain contaminated soils from CS 010, CS 022, CS 024, and the Small Arms Firing Range site.

Cleanup of the Focused Strategic Sites began in 2013 with the excavation of the former landfill known as CS 010 on the west side of the base, and construction of the site's engineered Consolidation Unit. An engineered Combined Cap was installed over four adjacent landfills and a fire training area. The cap is finished and the City of Sacramento Fire Department is using the new access road to reach their adjacent training facility.

In 2014, two additional landfills were excavated and backfilled with clean soil – CS 024 on the southern tip of the base alongside the railroad tracks, and CS 022 next to the Groundwater Treatment Plant on Patrol Road. Trucks carried the excavated soils to the CU for safe, permanent disposal.

The Small Arms Firing Range on the northwest side of the base was excavated in 2014. The lead-laden soil was treated with Portland cement to bind the lead before depositing it into the Consolidation Unit. The Air Force coordinated closely with the Northern California Regional Public Safety Training Authority to limit disruptions to their ongoing training for law enforcement agencies.

In 2015, another debris area in the Focused Strategic Sites Project, PRL 008, located just north of the CU, was excavated in one small spot. An engineered cap was installed over that site.

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From: Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]
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To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: Process for Landfill/CAMU on source area

Hi Lynn – Can you please outline the requirements (EPA process) for constructing a landfill in OU-7, OU-8, or OU-9 for consolidation of all CERCLA waste and solid waste landfill material? Could we also put WRND waste material (non-CERCLA) in this landfill?

Thanks, Chris

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